

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FUND TEXAS CHOICE, *et al.*,

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Plaintiffs,

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§

§

v.

§

No. 1-22-CV-859-RP

§

**KEN PAXTON, in his official capacity
of Attorney General, *et al.***

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Defendants.

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DEFENDANT’S EXHIBIT LIST

TO THE HONORABLE ROBERT PITMAN:

Defendant Ken Paxton, in his official capacity as Attorney General of Texas, hereby files this Exhibit List for the hearing on Plaintiffs’ Motion for Preliminary Injunction.

<u>Exhibit</u>	<u>Description</u>
1	TEA Fund (@TEAFund), TWITTER (June 24, 2022, 10:49AM).
2	“Abortion nonprofits say Texas state Rep. Briscoe Cain defamed them in ‘cease-and-desist’ letter,” TEXAS TRIBUNE (March 29, 2022), https://www.texastribune.org/2022/03/29/abortion-funds-defamation-briscoe-cain/ .
3	TEA Fund (@TEAFund), TWITTER (Sept. 22, 2022, 11:57AM).
4	TEA Fund, https://www.northtexasgivingday.org/organization/Texas-Equal-Access-Fund-Tea-Fund .
5	The Afiya Center (@TheAfiyaCenter), TWITTER (Sept. 22, 2022, 9:15AM).
6	The Afiya Center, https://www.northtexasgivingday.org/organization/The-Afiya-Center .
7	TEAFund (@TEAFund), TWITTER (Sept. 22, 2022, 7:44AM).

8	TEA Fund – Communications and Development Associate, https://www.idealists.org/en/nonprofit-job/1e5558a0636e4acba2be676e935ad4a7-communications-and-development-associate-texas-equal-access-fund-dallas .
9	TEA Fund (@TEAFund), TWITTER (Sept. 19, 2022, 11:01AM).
10	TEA Fund (@TEAFund), TWITTER (Sept. 13, 2022, 4:20PM).
11	TEA Fund (@TEAFund), TWITTER (Sept. 9, 2022, 9:29AM).
12	TEA Fund Programs Associate job posting, https://www.idealists.org/en/nonprofit-job/e6550d618fe44c9ea9fd01cec1d03877-programs-associate-texas-equal-access-fund-dallas
13	TEA Fund (@TEAFund), TWITTER (Sept. 8, 2022, 12:56PM).
14	TEA Fund (@TEAFund), TWITTER (Sept. 1, 2022, 10:58AM).
15	Frontera Fund (@LaFronteraFund), TWITTER (Sept. 1, 2022, 10:58AM).
16	TEA Fund (@teafund), INSTAGRAM (Aug. 22, 2022).
17	TEA Fund (@teafund), INSTAGRAM (Sept. 2, 2022).
18	TEA Fund (@teafund), INSTAGRAM (Sept. 3, 2022).
19	TEA Fund (@teafund), INSTAGRAM (Sept. 7, 2022).
20	Lilith Fund (@lilithfund), INSTAGRAM (July 5, 2022).
21	TEA Fund (@teafund), TWITTER (Aug. 22, 2022, 4:28PM).
22	Jane’s Due Process (@JanesDueProcess), TWITTER, Pinned Tweet.
23	Jane’s Due Process (@JanesDueProcess), TWITTER (July 5, 2022, 11:06AM).
24	Jane’s Due Process (@JanesDueProcess), TWITTER (July 13, 2022, 9:04AM).
25	TEA Fund (@teafund), TWITTER (Sept. 8, 2022, 5:00PM).
26	TEA Fund (@TEAFund), TWITTER (Aug. 18, 2022, 11:10AM).
27	Lilith Fund (@lilithfund), INSTAGRAM (Sept. 22, 2022).
28	Legislate This – Benefit for the Lilith Fund, https://www.eventbrite.com/e/legislate-this-benefit-for-the-lilith-fund-tickets-405391335397 .
29	Lilith Fund – Hype Squad, https://www.lilithfund.org/hypesquad .

30	Frontera Fund (@fronterafundrgv), INSTAGRAM, (Aug. 10, 2022).
31	The Afiya Center, (@TheAfiyaCenter), TWITTER (Sept. 15, 2022, 5:27PM).
32	Fund Texas Choice, (@FundTexasChoice), TWITTER (Sept. 15, 2022, 10:47AM).
33	Fund Texas Choice, (@FundTexasChoice), TWITTER (Aug. 24, 2022, 11:12AM).
34	Fund Texas Choice, (@FundTexasChoice), TWITTER (Aug. 25, 2022, 12:32PM).
35	Frontera Fund, (@LaFronteraFund), TWITTER (Sept. 10, 2022, 10:11AM).
36	Frontera Fund, (@LaFronteraFund), TWITTER (Sept. 9, 2022, 3:25PM).
37	Frontera Fund, (@LaFronteraFund), TWITTER (Aug. 27, 2022, 3:26PM).
38	Frontera Fund, (@LaFronteraFund), TWITTER (Aug. 22, 2022, 4:28PM).
39	Lilith Fund, https://www.lilithfund.org/portfolio/need-help/ .
40	Lilith Fund (@lilithfund), TWITTER (Sept. 1, 2022, 3:54PM).
41	Lilith Fund (@lilithfund), TWITTER (Aug. 7, 2022, 9:50AM).
42	Lilith Fund (@lilithfund), TWITTER (July 31, 2022, 9:32AM).
43	Ghazaleh Moayed, (@dr_moayed), TWITTER (June 27, 2022, 2:50PM).
44	Ghazaleh Moyaedi, (@dr_moayed), TWITTER (June 27, 2022, 7:59AM).
45	Ghazaleh Moayed, (@dr_moayed), TWITTER (June 22, 2022, 7:34PM).
46	Ghazaleh Moayed, (@dr_moayed), TWITTER (Sept. 13, 2022, 9:32AM).
47	Jezebel, "Abortion Providers Would Like You to Please Stop Interviewing Anti-Abortion Propagandists," (Aug. 15, 2022), https://jezebel.com/abortion-providers-would-like-you-to-please-stop-interv-1849407091 .
48	Rosann Mariappuram (@ReproRose), TWITTER (Aug. 10, 2022, 11:01AM).
49	Frontera Fund (@lafronterafund), TWITTER (Sept. 13, 2022, 1:25PM).

Defendant also designates as potential exhibits any item on Plaintiff's exhibit list and reserves the right to use any other document not identified for the purposes of impeachment.

Respectfully submitted.

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ William D. Wassdorf

WILLIAM D. WASSDORF

Assistant Attorney General